

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

James Judah (Bar No. 257112)

jamesjudah@quinnemanuel.com

Lindsay Cooper (Bar No. 287125)

lindsaycooper@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Marc Kaplan (*pro hac vice*)

marckaplan@quinnemanuel.com

191 N. Wacker Drive, Ste 2700

Chicago, Illinois 60606

Telephone: (312) 705-7400

Facsimile: (312) 705-7401

Attorneys for Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff,

vs.

SONOS, INC.,

Defendant.

Case No. 3:20-cv-06754-WHA

Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS MOTION TO
STRIKE PORTIONS OF THE EXPERT
REPORTS OF DOUGLAS SCHMIDT**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
7 Seal Portions of its Motion to Strike Portions of the Expert Reports of Douglas Schmidt (“Motion to
8 Strike”). If called as a witness, I could and would testify competently to the information contained
9 herein.

10 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Strike	Portions highlighted in yellow	Google
Exhibit 1 to the Declaration of Marc Kaplan in Support of Google’s Motion to Strike (“Exhibit 1”)	Entire document	Google
Exhibit 2 to the Declaration of Marc Kaplan in Support of Google’s Motion to Strike (“Exhibit 2”)	Entire document	Google
Exhibit 3 to the Declaration of Marc Kaplan in Support of Google’s Motion to Strike (“Exhibit 3”)	Entire document	Google
Exhibit 4 to the Declaration of Marc Kaplan in Support of Google’s Motion to Strike (“Exhibit 4”)	Entire document	Google
Exhibit 5 to the Declaration of Marc Kaplan in Support of Google’s Motion to Strike (“Exhibit 5”)	Entire document	Google
Exhibit 6 to the Declaration of Marc Kaplan in Support of Google’s Motion to Strike (“Exhibit 6”)	Entire document	Google

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25 4. The portions of Google’s Motion to Strike highlighted in yellow and Exhibits 1 – 8
26 contain references to Google’s confidential business information and trade secrets, including details
27 regarding architecture and technical operation of Google’s products and functionalities that Sonos
28 accuses of infringement. The specifics of how these functionalities operate is confidential information

1 that Google does not share publicly. Thus, public disclosure of such information could lead to
2 competitive harm to Google as competitors could use these details regarding the architecture and
3 functionality of Google's products to gain a competitive advantage in the marketplace with respect to
4 their competing products. I also understand that a less restrictive alternative than sealing these
5 documents would not be sufficient because the information sought to be sealed is Google's
6 confidential business information and trade secrets but is necessary to Google's Motion to Strike.

7 I declare under penalty of perjury under the laws of the United States of America that to the
8 best of my knowledge the foregoing is true and correct. Executed on January 27, 2023, in Los
9 Angeles, California.

10 DATED: January 27, 2023

11 By: /s/ Nima Hefazi
12 Nima Hefazi
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ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: January 27, 2023

/s/ Charles K. Verhoeven

Charles K. Verhoeven